

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

Civil Action No. 1:18-cv-00915-MIS-SCY

BARBARA MOHON,

Plaintiff,

v.

AGENTRA LLC, TRACYANN NICOLE  
HAMILTON and Jane Does 1-10

Defendants.

**DECLARATION OF DONIECE FOSTER IN SUPPORT OF  
DEFENDANT'S MOTION TO SET ASIDE DEFAULT JUDGMENT**

1. I, Doniece Foster, am over the age of eighteen years and am competent to make this declaration.

2. I have knowledge of the matters set forth in this declaration, based on my personal knowledge.

3. I was office manager for Dean-Hamilton Insurance, LLC, which later transitioned to Dean-Hamilton Corporation ("DH Corp). from [date] to [date]. I also performed office manager work for Dean-Hamilton Socioeconomic Development Corp ("DH Socioeconomic Corp.") and Smith & Hamilton Corp.

4. Ms. TracyAnn Nicole Hamilton ("Ms. Hamilton") was the owner of DH LLC, later DH Corp and also DH Socioeconomic Corp. and Smith & Hamilton Corp., and my employer at the time.

5. In that capacity as office manager at DH LLC, DH Corp., DH Socioeconomic and Smith & Hamilton Corp., I was responsible for corporate filings such as those with the Florida Secretary of State.

6. True and correct copies of filings that I handled for DH LLC, DH Corp., Smith & Hamilton Corp. and DH Socioeconomic Corp. are attached hereto as Exhibit A-N.

A	2019 Annual Report for DH LLC
B	2019 Cover Letter for Articles of Dissolution for DH LLC
C	June 2019 Transmittal Letter re Article of Incorporation for DH Corp
D	2020 Florida Profit Corp Annual Report for DH Corp
E	2021 Florida Profit Corp Annual Report for DH Corp
F	2022 Florida Profit Corp Annual Report for DH Corp
G	March 9, 2020 Articles of Incorporation for Smith & Hamilton Corp.
H	2021 Florida Profit Corp Annual Report for Smith & Hamilton Corp.
I	Article of Incorporation – DH Socioeconomic
J	Transmittal Letter - DH Socioeconomic
K	2020 Florida Not for Profit Corporation Annual Report - DH Socioeconomic
L	2021 Florida Not for Profit Corporation Annual Report - DH Socioeconomic
M	2022 Florida Not for Profit Corporation Annual Report - DH Socioeconomic
N	2022 Florida Not for Profit Corporation Amended Annual Report - DH Socioeconomic

7. In these filings, although I consistently updated the mailing address, I did not update the business address of 7971 Riviera Blvd #101, Miramar, FL 33023 (“Riviera Address”) I never worked at the Riviera address and was not working from that address at any point.

8. Any representation that the Riviera Address was the business address for DH LLC, DH Corp., Smith & Hamilton Corp. or DH Socioeconomic from my corporate filings would be a clerical error.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of September 2022, at Davie, FL.



Doniece Foster